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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF PATRICK
SCHMIDT IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS LETTER BRIEF AND
EXHIBIT 3 THERETO**

1 I, Patrick Schmidt, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal portions of its Letter Brief requesting production of an unredacted version of a letter sent from
8 John Gardner to Stroz Friedberg, LLC (the “Letter Brief”) and Exhibit 3 thereto, filed concurrently
9 herewith (the “Administrative Motion”). The Administrative Motion seeks an order sealing the
10 following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Letter Brief	Highlighted Portions	Defendants
Exhibit 3	Entire Document	Defendants

14 3. Waymo’s Letter Brief contains references to information that Defendants have
15 designated as confidential, and Exhibit 3 thereto has been designated confidential by Defendants.

16 4. Waymo expects Defendants to file one or more declarations in accordance with the
17 Local Rules.

18 I declare under penalty of perjury under the laws of the State of California and the United
19 States of America that the foregoing is true and correct, and that this declaration was executed in Los
20 Angeles, California, on June 3, 2017.

21 By /s/ Patrick Schmidt

22 Patrick Schmidt
23 Attorneys for WAYMO LLC
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SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven